

Stephanie  
Doolan



Jeremiah W. (Jay) Nixon, Governor • Mark N. Templeton, Director

## DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

July 16, 2009

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RETURN RECEIPT REQUESTED

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JUL 21 2009

Mr. Joseph Haake  
Group Manager  
Environmental and Hazardous  
Materials Services  
The Boeing Company  
Department 107E, Building 111  
Mail Code S111-2491  
P.O. Box 516  
St. Louis, MO 63166-0516

RE: Hazardous Waste Permit Application  
McDonnell Douglas Corporation (wholly owned subsidiary of The Boeing Company)  
Hazelwood, Missouri  
EPA ID# MOD000818963

### NOTICE OF DEFICIENCY

Dear Mr. Haake:

This letter is to notify you that the Missouri Department of Natural Resources (Department) reviewed McDonnell Douglas Corporation's Tract 1 hazardous waste permit application, dated February 28, 2007, for completeness, as required by Code of State Regulations 10 CSR 25-8.124(1)(A)3.B. The Department determined that the permit application is incomplete for the purpose of public participation and technical review. Included with this letter is a copy of the Completeness Checklist completed as part of our review. The following items have not been submitted:

1. Proof of coverage by a State financial mechanism [40 CFR 270.14(b)(18)]. Financial assurance is required for implementation of the final corrective action remedy at the site.
2. Proposed point of compliance [40 CFR 270.14(c)(3)].
3. The U.S. Environmental Protection Agency's (EPA) Resource Conservation and Recovery Act (RCRA) Hazardous Waste Part A Permit Application.
4. Identify all Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) with [40 CFR 270.14(d)1]:

Location of each unit on a topographic map with:



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Designation of type of unit;  
General dimensions and structural description;  
Dates the unit operated; and  
Specification of all wastes managed at the unit.

5. Submit all available information pertaining to any release of hazardous waste or hazardous constituent from such unit or units [40 CFR 270.14(D)2].

Please complete the enclosed Description of Solid Waste Management Units and Areas of Concern form to address Items 4 and 5 for each SWMU or AOC. Although this information was provided in the facility's RCRA Facility Investigation (RFI) report, it is necessary to know the current status for each SWMU or AOC in order to draft the facility permit. The form should indicate which units have been adequately addressed in the RFI and do not require further investigation/remediation, which units have undergone or undergoing interim measures, and which units will be addressed in the corrective measures study and require corrective action under the permit.

Please submit three copies of the appropriate revised page(s) of an addendum to the permit application, to the Department, and two copies to the EPA, within 30 days of receiving this letter. We will review the additional information and notify you as to whether your permit application is complete for purposes of public participation and technical review.

If you have any questions regarding this letter or the enclosed checklist, please contact me at the Missouri Department of Natural Resources, 7545 South Lindbergh, Suite 210, St. Louis, MO 63125-4839, or by phone at (314) 416-2960 or 1-800-361-4827, or by e-mail at christine.kump@dnr.mo.gov.

Sincerely,

HAZARDOUS WASTE PROGRAM



Christine Kump-Mitchell, P.E.  
Environmental Engineer  
Permits Section

CKM:sw

Enclosures

c: Ms. Stephanie Doolan, Project Manager, U.S. EPA Region VII ✓  
Ms. Christine Jump, Missouri State Coordinator, U.S. EPA Region VII  
St. Louis Regional Office, Missouri Department of Natural Resources

**Description of Solid Waste Management Units and Areas of Concern**  
**40 CFR 270.14(d)**

**SWMU/AOC Number:** \_\_\_\_\_  
(This number to be used to locate the SWMU on the topographic map.)

**SWMU/AOC Name:** \_\_\_\_\_  
\_\_\_\_\_

**SWMU/AOC Description (Current):** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
(Include type of unit, general dimensions and structural description.)

**Dates of Operation:** \_\_\_\_\_  
\_\_\_\_\_

**Wastes Managed:** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
(Include any other constituents of concern and reasoning.)

**Investigation/Remediation Conducted:** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
(Indicate if sampling for releases have been conducted, the media sampled and reference the report.)

**Release Information:** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
(Indicate release history, controls, media involved and the migration pathways.)

## COMPLETENESS CHECKLIST FOR PURPOSES OF PUBLIC PARTICIPATION

(Federal Regulations for Part B Permit Application can be found in 40 CFR 270.10-270.29)

(Applicable State Regulation can be found 10 CSR 25)

"Introduction to Treatment, Storage and Disposal Facilities" (EPA) 530-K-05-017

*\*Please Note: All underlined words in blue are internet hyperlinks*

### 40 CFR 270.28 - Contents of Part B: General Requirements for Post-Closure Permits: [\(click here for link\)](#)

*"For post-closure permits, the owner or operator is required to submit only the information specified in §§270.14(b)(1), (4), (5), (6), (11), (13), (14), (16), (18) and (19), (c), and (d), unless the Regional Administrator determines that additional information from §§[270.14](#), [270.16](#) (Tanks\subpart J), [270.17](#) (Surface Impoundments\subpart K), [270.18](#) (Waste Piles\subpart L), [270.20](#) (Land Treatment\Subpart M), or [270.21](#) (Landfills\subpart N) is necessary. The owner or operator is required to submit the same information when an alternative authority is used in lieu of a post-closure permit as provided in §[270.1\(c\)\(7\)](#)."*

### 40 CFR 270.3 - Considerations Under Federal Law [40 CFR 270.3]: [\(click here for link\)](#)

Y

Applicable information under the:

Wild and Scenic Rivers Act; <http://www.rivers.gov/wildriverslist.html>

National Historic Preservation Act; <http://www.dnr.mo.gov/shpo>,  
<http://www.dnr.mo.gov/shpo/MNRList.htm>

Endangered Species Act; <http://mdc.mo.gov/heritage/new/heritage/heritage.htm>  
[http://www.fws.gov/endangered/listing\\_index.html](http://www.fws.gov/endangered/listing_index.html), and  
[http://ecos.fws.gov/fess\\_public/pub/stateListingIndividual.jsp?state=MO&status=list](http://ecos.fws.gov/fess_public/pub/stateListingIndividual.jsp?state=MO&status=list)

Coastal Zone Management Act (Not Applicable in Missouri); and

Fish and Wildlife Coordination Act. \**(only applicable if facility plans to modify waterways)*

### 40 CFR 270.14 - Contents of Part B: General Requirements: [\(click here for link\)](#)

Y

General Facility Description [40 CFR 270.14(b)(1)]

N/A

Description of Security or Waiver Request [40 CFR 270.14(b)(4)]

N/A

Inspection Schedule and Procedures [40 CFR 270.14(b)(5)]

N/A

Preparedness and Prevention Requirements or Waiver Request  
[40 CFR 270.14(b)(6)]

Y

Facility Location - Seismic and Floodplain Standards [40 CFR 270.14(b)(11)]

<u>N/A</u>	Closure/Post-Closure Plan [40 CFR 270.14(b)(13)]
<u>N</u>	Documentation to show confirmation on Closed units meeting the requirements under 40 CFR 264.119 [40 CFR 270.14(b)(14)]
<u>N</u>	Post-Closure Cost Estimate and Financial Responsibility Documents [40 CFR 270.14(b)(16)]
<u>N</u>	Proof of coverage by a State financial mechanism [40 CFR 270.14(b)(18)]
<u>Y</u>	Topographical Maps [40 CFR 270.14(b)(19)]

**40 CFR 270.14 - Contents of Part B: General Requirement for Groundwater Protection of Regulated Land Based Units at Active/Post-Closure Hazardous Waste Facilities : [40 CFR 270.14(c)]** [\(click here for link\)](#)

<u>Y</u>	Summary of Interim Status Groundwater Monitoring Data [40 CFR 270.14(c)(1)]
<u>Y</u>	Aquifer Identification [40 CFR 270.14(c)(2)]
<u>N</u>	Proposed Compliance Point [40 CFR 270.14(c)(3)]
<u>Y</u>	Description of Any Contaminant Plume [40 CFR 270.14(c)(4)]
<u>Y</u>	Detailed Plans and an Engineering Report Describing the Proposed Ground Water Monitoring Program to be Implemented [40 CFR 270.14(c)(5)]
<u>Y</u>	Valid Groundwater Detection Monitoring Program [40 CFR 270.14(c)(6)]
<u>Y</u>	Valid Groundwater Compliance Monitoring Program [40 CFR 270.14(c)(7)]
<u>Y</u>	Valid Groundwater Corrective Action Program [40 CFR 270.14(c)(8)]

**40 CFR 270.14 - Contents of Part B: General Requirement for Solid Waste Management Units : [40 CFR 270.14(d)]** [\(click here for link\)](#)

(Please use the Attached Form)

<u>Y</u>	Identify all SWMU's and AOC with: [40 CFR 270.14(d)1] The location of the each unit on the topographic map with: Designation of type of unit; General dimensions and structural description; When the unit was operated; & Specification of all wastes that have been managed at the unit
<u>Y</u>	Submit all available information pertaining to any release of hazardous wastes or or hazardous constituents from such unit or units [40 CFR 270.14(d)2]

Y The owner/operator must conduct and provide the results of sampling and analysis of groundwater, land surface, and subsurface strata, surface water, or air, which may include the installation of wells. [40 CFR 270.14(d)3]

**Other Requirements:**

[\(click here for 10 CSR 25\)](#) [\(click here for Chapter 260 RSMo.\)](#)

Y Missouri Application Form with Attachments and Certification  
[Section 260.395.7(1) RSMo., 10 CSR 25-7.270(2)(B)1.] [\(click here for application\)](#)

N/A Justification for Requests for Confidentiality [Section 260.430 RSMo., 10 CSR 25-7.270(2)(B)2.]

Y Permit Application Fee (\$1000) [10 CSR 25-7.270(2)(B)8.]

N EPA RCRA Hazardous Waste Part A Permit Application, [\(click here for Form 8700-23\)](#).

Y Names and addresses (including labels) for adjacent landowners (one mile radius for disposal facilities) [10 CSR 25-7.270(2)(B)10.A and 10 CSR 25-8.124(1)(A)10.C.(I)(c.)III]

Y Names and addresses of local, state, and federal elected officials [10 CSR 25-8.124(1)(A)10.C.(I)(d.)]

Y Name, address and telephone number for the closest public library [10 CSR 25-8.124(1)(A)10.C.(I)(e.)]

Y Is the facility required to have an environmental covenant under Missouri Environmental Covenant Act (MoECA) under [RSMo. 260.1000 - 260.1039](#).

*\* If other sections are applicable please continue to pages below, otherwise checklist ends here.*

## (Additional information if applicable as stated in 40 CFR 270.28

*\*Sections 40 CFR 270.14, 270.16, 270.17, 270.18, 270.20 or 270.21 )*

*Also adding 40 CFR 270.23, 270.24, 270.25, 270.26*

### 40 CFR 270.14 - Contents of Part B: General Requirements (not listed above):

(click here for link)

<u>N/A</u>	Chemical Analysis of the Waste [40 CFR 270.14(b)(2)]
<u>N/A</u>	Waste Analysis Plan [40 CFR 270.14(b)(3)]
<u>N/A</u>	Contingency Plan [40 CFR 270.14(b)(7)]
<u>N/A</u>	Hazard prevention information [40 CFR 270.14(b)(8)]
<u>N/A</u>	Precautions to prevent accidental ignition or reaction of ignitable, reactive, or incompatible wastes [40 CFR 270.14(b)(9)]
<u>N/A</u>	Traffic pattern, estimated volume (number, types of vehicles) and control [40 CFR 270.14(b)(10)]
<u>N/A</u>	Personnel Training Requirements [40 CFR 270.14(b)(12)]
<u>N/A</u>	Copy of the insurance policy or other documentation which comprises compliance with the requirements [40 CFR 270.14(b)(17)]
<u>N/A</u>	A summary of the pre-application meeting (Any changes equivalent to a Class 3 modification?) [40 CFR 270.14(b)(22) & <u>40 CFR 124.31(c)</u> ]

### 40 CFR 270.16 - Specific Part B Requirements for Tanks: (click here for link)

<u>N/A</u>	Assessment of Structural Integrity and Suitability [40 CFR 270.16(a)]
<u>N/A</u>	Tank Dimensions and Capacity [40 CFR 270.16(b)]
<u>N/A</u>	Description of Feed Systems and Bypass System Pressure Controls [40 CFR 270.16(c)]
<u>N/A</u>	Diagram of Piping Instrumentation and Process Flow [40 CFR 270.16(d)]
<u>N/A</u>	Description of External Corrosion Prevention [40 CFR 270.16(e)]
<u>N/A</u>	Description of the Secondary Containment System [40 CFR 270.16(g)]
<u>N/A</u>	Spill and Overflow Prevention [40 CFR 270.16(i)]
<u>N/A</u>	Buffer Zone Requirements for Ignitable or Reactive Wastes [40 CFR 270.16(j)]
<u>N/A</u>	Information on air emission control equipment [40 CFR 270.16(k)]

N/A Prohibitions on storage of waste restricted from land disposal greater than one year [40 CFR 268.50(c)]

**40 CFR 270.17 - Specific Part B Requirements for Surface Impoundments:**

[\(click here for link\)](#)

N/A Engineering Plans and Reports Showing a Double Liner or a Request (With Justification) for Exemption [40 CFR 270.17(b)]

N/A Procedures for Removal from Service for Repairs [40 CFR 270.17(e)]

N/A Prohibitions on Land Disposal [40 CFR 268.30, 268.31, 268.32, 268.33, 268.34, 268.35]

N/A Treatment Standards [40 CFR 268.40]

**40 CFR 270.18 - Specific Part B Requirements for Waste Piles:** [\(click here for link\)](#)

N/A Liner [40 CFR 270.18(c)]

N/A Design and Operating Requirements [40 CFR 264.251]

N/A Prohibitions on Land Disposal [40 CFR 268.30, 268.31, 268.32, 268.33, 268.34, 268.35]

N/A Treatment Standards [40 CFR 268.40]

**40 CFR 270.20 - Specific Part B Requirements for Land Treatment:**

[\(click here for link\)](#)

N/A Treatment Demonstration [40 CFR 270.20(a)]

N/A Unsaturated Zone Monitoring [40 CFR 270.20(b)(3)]

N/A Site Suitability Demonstration [40 CFR 270.20(a)]

N/A 500 Geodesic Feet from Water Supplies [10 CSR 25-7.264(2)(M)1.A(III)]

N/A Discussion of Food Chain Crops [40 CFR 270.20(d)(e)]

N/A Run-off Management [40 CFR 270.20(c)]

N/A Prohibitions on Land Disposal [40 CFR 268.30, 268.31, 268.32, 268.33, 268.34, 268.35]

N/A Treatment Standards [40 CFR 268.40]

**40 CFR 270.21 - Specific Part B Requirements for Landfills:** [\(click here for link\)](#)

N/A List of Hazardous Wastes to be Placed in Landfill [40 CFR 270.21(a)]

N/A Description of Liner System [40 CFR 270.21(b)(1)]

N/A Description of Leachate Collection and Removal System [40 CFR 270.21(b)(1)]

N/A Description of Run-on Control System [40 CFR 270.21(b)(2)]



<u>N/A</u>	Description of Run-off Control System [40 CFR 270.21(b)(3)]
<u>N/A</u>	Description of Management Practices for Run-on and Run-off Control Systems [40 CFR 270.21(b)(4)]
<u>N/A</u>	Description of Wind Dispersal Control System [40 CFR 270.21(b)(5)]
<u>N/A</u>	300 Feet Buffer Zone [10 CSR 25-7.264(2)(N)2.D.]
<u>N/A</u>	Description of Inspection Plan [40 CFR 270.21(d)]
<u>N/A</u>	Description of Final Cover at Closure and Maintenance After Closure [40 CFR 270.21(e)]
<u>N/A</u>	Landfilling of Incompatible Wastes [40 CFR 270.21(g)]
<u>N/A</u>	Landfilling of Containers of Hazardous Wastes [40 CFR 270.21(i)]
<u>N/A</u>	Description of Landfill Design for Waste Nos. F020, F021, F022, F026, and F027 [40 CFR 270.21(j)]
<u>N/A</u>	Prohibitions on Land Disposal [40 CFR 268.30, 268.31, 268.32, 268.33, 268.34, 268.35]
<u>N/A</u>	Treatment Standards [40 CFR 268.40]
<u>N/A</u>	Post-Closure Care [40 CFR 264.603]

#### 40 CFR 270.23 - Specific Part B Requirements for Miscellaneous

Units: [\(click here for link\)](#)

<u>N/A</u>	Environmental Performance Standards [40 CFR 264.601]
<u>N/A</u>	Monitoring, Analysis, Inspection, Response, Reporting and Corrective Action [40 CFR 264.602]
<u>N/A</u>	Post-Closure Care [40 CFR 264.603]

#### 40 CFR 270.24 - Specific Part B Requirements for Process Vents:

(Subpart AA) [\(click here for link\)](#)

<u>N/A</u>	Applicability [40 CFR 264.1030]
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#### 40 CFR 270.25 - Specific Part B Requirements for Equipment Leaks: (Subpart BB)

[\(click here for link\)](#)

<u>N/A</u>	Applicability [40CFR 264.1050]
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#### 40 CFR 270.27 - Specific Part B Requirements for Tanks, Surface

Impoundments, and Containers: (Subpart CC) [\(click here for link\)](#)

<u>N/A</u>	Applicability [40 CFR 264.1080]
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